#### IN THE UNITED STATES DISTRICT COURT

#### FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA : CRIMINAL NO. 08-493

v. : DATE FILED: May 28, 2009

AMIN A. RASHID, : VIOLATIONS:

a/k/a "Lawrence D. Wilson" 18 U.S.C. § 1341 (mail fraud - 10 counts)

18 U.S.C. § 1028A (aggravated identity

theft - 8 counts)

: 18 U.S.C. § 500(4) (passing altered postal

money order - 1 count)
Notice of forfeiture

### SUPERSEDING INDICTMENT

### **COUNTS ONE THROUGH TEN**

#### THE GRAND JURY CHARGES THAT:

At all times relevant to this indictment:

- 1. Defendant AMIN A. RASHID gave himself the title of "Director of Legal and Political Affairs" for The Center for Constitutional and Criminal Justice, Inc. (the "Center"), a company that he operated under the guise of helping the prior owners of properties sold at Sheriff's sales. Defendant RASHID told these prior owners that he could help recover the properties or proceeds from the Sheriff's sales. Defendant RASHID hired employees to help him locate these prior owners.
- 2. The Philadelphia Sheriff's Office ("Sheriff") sells properties to pay unpaid debts owed to the City of Philadelphia and other creditors.
- 3. City Line Abstract Company ("City Line"), located at 15 Saint Asaph's Avenue in Bala Cynwyd, Pennsylvania, is a title company that determines, after debts are paid on properties sold by the Sheriff, whether the Sheriff should distribute any remaining proceeds to

the prior owners of the properties.

4. Defendant AMIN A. RASHID fraudulently secured and fraudulently attempted to secure proceeds due to the prior owners of properties sold by the Sheriff. Defendant RASHID presented to the Sheriff and City Line fraudulent identification documents and forged power of attorney documents in which the prior owners purportedly authorized defendant RASHID and/or the Center to collect the remaining proceeds from Sheriff's sales.

#### THE SCHEME

5. From at least in or about December 2005 to in or about August 2008, defendant

### AMIN A . RASHID, a/k/a "Lawrence D. Wilson."

devised and intended to devise a scheme to defraud and to obtain money and property by means of false and fraudulent pretenses, representations, and promises.

#### MANNER AND MEANS

It was part of the scheme that:

- 6. Defendant AMIN A. RASHID obtained fees from his clients, the prior owners of properties sold at Sheriff's sales, in exchange for agreeing to help them with reversing Sheriff's sales or recovering proceeds. Typically, defendant RASHID did nothing for his clients and kept the fees.
- 7. Defendant AMIN A. RASHID had these clients sign power of attorney documents that appointed defendant RASHID as their "Attorney-In-Fact" for the purpose of reversing Sheriff's sales and/or claiming proceeds from Sheriff's sales. Defendant RASHID also

obtained photocopies of his Center clients' driver's licenses.

- 8. Defendant AMIN A. RASHID submitted to the Sheriff and City Line forged power of attorney documents that purportedly carried the signatures of the prior owners of the properties and the dates of their purported signatures. Some of those prior owners, however, had in fact died prior to the dates of their purported signatures.
- 9. Defendant AMIN A. RASHID submitted to the Sheriff and City Line photocopies of fraudulent driver's licenses of these deceased prior owners. These driver's licenses, however, were photocopies of the driver's licenses of his clients that defendant RASHID altered to include the deceased prior owners' names and the property addresses, and still contained the photographs, dates of birth, and driver's license numbers of his clients.
- 10. Defendant fraudulently offered to arrange financing to purportedly help two of his clients buy back their property sold at Sheriff's sale. Defendant RASHID fraudulently secured from them more than \$50,000 that defendant RASHID promised to hold in "escrow" while he purportedly attempted to help them buy back their property. Defendant RASHID did nothing for his two clients and kept the \$50,000 for himself.
- 11. Defendant AMIN A. RASHID submitted to the Sheriff and City Line bogus corporate resolutions that purportedly authorized his Center and his Center's attorney to collect any proceeds from Sheriff's sales of properties last owned by those corporations.

  Defendant RASHID used his family members to pose as officers of these corporations.
- 12. Defendant AMIN A. RASHID defrauded the Sheriff and others of at least \$650,000.

### THE MAILINGS

13. On or about the dates set forth below, in the Eastern District of Pennsylvania, defendant

### AMIN A . RASHID, a/k/a "Lawrence D. Wilson,"

for the purpose of executing the scheme described above, and attempting to do so, knowingly caused to be delivered by mail and commercial interstate carrier according to the directions thereon, and placed in a post office or authorized depository for mail matter, the following mailings:

COUNT	DATE	DESCRIPTION OF MAILING
ONE	December 5, 2005	Letter dated December 2, 2005, offering assistance in recovering 5622 Haverford Avenue after Sheriff's sale, mailed from defendant RASHID to M.R.
TWO	December 16, 2005	Letter dated December 14, 2005, offering assistance in recovering 2135 South 16 <sup>th</sup> Street after Sheriff's sale, mailed from defendant RASHID to L.A.
THREE	July 15, 2006	Letter dated July 5, 2006, requesting proceeds from the Sheriff's sale of 432 Spruce Street and enclosing a bogus corporate resolution, mailed from defendant RASHID to City Line
FOUR	July 10, 2007	Letter dated June 28, 2007, enclosing a bogus Limited Power of Attorney document and a photocopy of the purported driver's license of E.R., mailed from defendant RASHID to City Line
FIVE	September 17, 2007	Letter dated September 17, 2007, offering a partial refund of the proceeds defendant RASHID fraudulently collected from the Sheriff's sale of 1907-1915 Ridge Avenue, mailed from defendant RASHID to City Line

SIX	October 2, 2007	Letter dated October 1, 2007, inquiring about proceeds from the Sheriff's sale of 2553 South Mildred Street, mailed from defendant RASHID to City Line
SEVEN	October 9, 2007	Letter dated October 3, 2007, enclosing a bogus Limited Power of Attorney document and photocopies of the purported driver's licenses of R.D. and M.D., mailed from defendant RASHID to City Line
EIGHT	October 26, 2007	Letter dated October 25, 2007, inquiring about proceeds from the Sheriff's sale of 137 North 3 <sup>rd</sup> Street, mailed from defendant RASHID to City Line
NINE	October 31, 2007	Letter dated October 31, 2007, enclosing documents and requesting proceeds from the Sheriff's sale of 1428 Montrose Street, mailed from defendant RASHID to City Line
TEN	August 4, 2008	Letter dated August 1, 2008, claiming proceeds from the Sheriff's sale of 1219-1221 South 18 <sup>th</sup> Street, sent by Federal Express from defendant RASHID to City Line

All in violation of Title 18, United States Code, Section 1341.

### **COUNT ELEVEN**

### THE GRAND JURY FURTHER CHARGES THAT:

From in or about August 2007 to in or about August 2008, in the Eastern District of Pennsylvania, defendant

## AMIN A . RASHID, a/k/a "Lawrence D. Wilson,"

knowingly and without lawful authority transferred, possessed, and used, a means of identification of another person, that is, the Pennsylvania Driver's License Number (XXXXX522) of R.K., during and in relation to mail fraud.

### **COUNT TWELVE**

### THE GRAND JURY FURTHER CHARGES THAT:

From in or about August 2007 to in or about October 2007, in the Eastern District of Pennsylvania, defendant

## AMIN A . RASHID, a/k/a "Lawrence D. Wilson,"

knowingly and without lawful authority transferred, possessed, and used, a means of identification of another person, that is, the date of birth (XX-XX-1939) of T.W., during and in relation to mail fraud.

### **COUNT THIRTEEN**

### THE GRAND JURY FURTHER CHARGES THAT:

From in or about August 2007 to in or about October 2007, in the Eastern District of Pennsylvania, defendant

## AMIN A . RASHID, a/k/a "Lawrence D. Wilson,"

knowingly and without lawful authority transferred, possessed, and used, a means of identification of another person, that is, the date of birth (XX-XX-1952) of J.K., during and in relation to mail fraud.

### **COUNT FOURTEEN**

### THE GRAND JURY FURTHER CHARGES THAT:

From in or about October 2007 to in or about November 2007, in the Eastern District of Pennsylvania, defendant

## AMIN A . RASHID, a/k/a "Lawrence D. Wilson,"

knowingly and without lawful authority transferred, possessed, and used, a means of identification of another person, that is, the date of birth (XX-XX-1940) of M.J., during and in relation to mail fraud.

### **COUNT FIFTEEN**

### THE GRAND JURY FURTHER CHARGES THAT:

From in or about May 2007 to in or about December 2007, in the Eastern District of Pennsylvania, defendant

# AMIN A . RASHID, a/k/a "Lawrence D. Wilson,"

knowingly and without lawful authority transferred, possessed, and used, a means of identification of another person, that is, the Pennsylvania Driver's License Number (XXXXX055) of A.M.F., during and in relation to mail fraud.

### **COUNT SIXTEEN**

### THE GRAND JURY FURTHER CHARGES THAT:

From in or about December 2005 to in or about September 2007, in the Eastern District of Pennsylvania, defendant

## AMIN A . RASHID, a/k/a "Lawrence D. Wilson,"

knowingly and without lawful authority transferred, possessed, and used, a means of identification of another person, that is, the date of birth (XX-XX-1955) of D.R., during and in relation to mail fraud.

### **COUNT SEVENTEEN**

### THE GRAND JURY FURTHER CHARGES THAT:

From in or about March 2007 to in or about September 2008, in the Eastern District of Pennsylvania, defendant

## AMIN A . RASHID, a/k/a "Lawrence D. Wilson,"

knowingly and without lawful authority transferred, possessed, and used, a means of identification of another person, that is, the date of birth (XX-XX-1954) of H.M., during and in relation to mail fraud.

### **COUNT EIGHTEEN**

### THE GRAND JURY FURTHER CHARGES THAT:

From in or about March 2007 to in or about September 2008, in the Eastern District of Pennsylvania, defendant

## AMIN A . RASHID, a/k/a "Lawrence D. Wilson,"

knowingly and without lawful authority transferred, possessed, and used, a means of identification of another person, that is, the date of birth (XX-XX-1951) of L.M., during and in relation to mail fraud.

### **COUNT NINETEEN**

### THE GRAND JURY FURTHER CHARGES THAT:

On or about November 18, 2008, in the Eastern District of Pennsylvania, defendant

## AMIN A . RASHID, a/k/a "Lawrence D. Wilson,"

knowingly transmitted, presented, and caused to be transmitted and presented, postal money order number 16359926747, with the intent to defraud R.E., knowing such postal money order to contain a material alteration unlawfully made

In violation of Title 18, United States Code, Section 500.

### **NOTICE OF FORFEITURE**

#### THE GRAND JURY FURTHER CHARGES THAT:

As a result of the violations of Title 18, United States Code, Sections 500,
 1028A, and 1341, set forth in this indictment, defendant

### AMIN A . RASHID, a/k/a "Lawrence D. Wilson,"

shall forfeit to the United States of America, any property, real or personal, that constitutes or is derived from proceeds obtained directly or indirectly as a result of such offenses.

- 2. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:
  - (a) cannot be located upon the exercise of due diligence;
  - (b) has been transferred or sold to, or deposited with, a third party;
  - (c) has been placed beyond the jurisdiction of the Court;
  - (d) has been substantially diminished in value; or
  - (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Section 982(b), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other

property of the defendants up to the value of the p	property subject to forfeiture.
All pursuant to Title 18, United Sta	ates Code, Section 982(a)(2).
	A TRUE BILL:
	FOREPERSON

MICHAEL L. LEVY United States Attorney